

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

**IN RE: : CHAPTER 13
GLENN MICHAEL HEAGERTY, JR. : CASE NUMBER G20-21593-JRS
DEBTOR :**

**CHAPTER 13 TRUSTEE'S SUPPLEMENTAL OBJECTION
TO CONFIRMATION AND MOTION TO DISMISS CASE OR, IN
THE ALTERNATIVE, MOTION TO CONVERT CASE TO CHAPTER 7**

COMES NOW, Nancy J. Whaley, the Standing Chapter 13 Trustee herein, and objects to Confirmation of the plan for the following reasons:

1.

The plan fails to treat Wilmington Savings Fund Society, FSB and Sawnee View Farms Homeowner's Association, Inc. in violation of 11 U.S.C. Section 1322(a)(3) and/or 11 U.S.C. Section 502(a).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny confirmation and convert the instant case to a Chapter 7 proceeding pursuant to 11 U.S.C. Section 1307(b).

Respectfully submitted,

/s/
Eric W. Roach,
Attorney for Chapter 13 Trustee
GA Bar No. 143194
303 Peachtree Center Ave., NE
Suite 120
Atlanta, GA 30303
(678) 992-1201

/scw

CERTIFICATE OF SERVICE

Case No: G20-21593-JRS

I certify that on this day I caused a copy of this Chapter 13 Trustee's Supplemental Objection to Confirmation and Motion to Dismiss Case or, in the Alternative, Motion to Convert Case to Chapter 7 to be served via United States First Class Mail with adequate postage prepaid on the following parties at the address shown for each:

GLENN MICHAEL HEAGERTY, JR.

2890 WILLOW WISP WAY

CUMMING, GA 30040

This the 9th day of February, 2021.

/s/

Eric W. Roach
Attorney for the Chapter 13 Trustee
State Bar No. 143194
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Suite 120
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